Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HIGHLAND HOLDINGS, INC., a Washington corporation,

Plaintiff,

v.

REN SEAFOODS INC., a Pennsylvania corporation,

Defendant.

Cause No. 2:23-cv-01108-KKE

STIPULATED MOTION TO EXTEND CERTAIN PRE-TRIAL DEADLINES AND ORDER

COME NOW all the parties to this case, and request that this Court extend the existing upcoming internal deadlines, as follows:

PRETRIAL DATES

| Event: | Current Deadline: | Proposed Deadline: |
|--|-------------------|--|
| Disclosure of expert testimony under FRCP 26(a)(2) | 04-01-2024 | Rebuttal: 05-15-2024 Supplemental: 06-15-2024 |
| All motions related to discovery must be filed by | 05-01-2024 | 07-01-2024 |
| Discovery must be completed by | 05-31-2024 | 07-31-2024 |

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| Dispositive motions and motions challenging expert witness testimony must be filed by this date (see LCR 7(d)). Such motions must be noted for consideration no later than the fourth Friday thereafter (see LCR 7(d)). | 07-01-2024 | no change |
|---|------------|-----------|
| Settlement conference, if mediation has been requested by the parties per LCR 39.1, held no later than | 08-29-2024 | no change |
| All motions in limine must be filed by | 09-23-2024 | no change |
| Agreed LCR 16.1 Pretrial Order due, including exhibit list with completed authenticity, admissibility, and objections fields | 10-07-2024 | no change |
| Trial briefs, preliminary proposed findings of fact and conclusions of law, and deposition designations due | 10-15-2024 | no change |
| Pretrial conference scheduled at 10:00 am on | 10-18-2024 | no change |
| BENCH TRIAL DATE at 9:30 am on | 10-28-2024 | no change |

Stipulated Motion and Order – page 2

Good cause exists for this limited extension of certain pretrial deadlines. First, the parties require additional time for expert witness discovery, which is underway and ongoing. Second, Defendant's primary counsel, Jacob Downs, of Corr Downs PLLC, is scheduled to begin an estimated four week trial on May 13, 2024 in the matter of *Covey v. Port of Seattle*, King County

1 Superior Court. Plaintiff has no objection to this rescheduling, which primarily impacts discovery only. This is the parties' first request for an extension of any deadlines. 2 All parties, as evidenced by the electronic signatures below, are in agreement to this 3 4 extension of time. Dated this 10th day of April, 2024. 5 6 7 VI JEAN RENO **CORR DOWNS PLLC** 8 s/ Jacob M. Downs s/ Vi Jean Reno Vi Jean Reno, WSBA No. 9385 Jacob M. Downs, WSBA No. 37982 9 Law Offices of Vi Jean Reno Joseph P. Corr, WSBA No. 36584 1420 Fifth Avenue, Suite 3000 Corr Downs PLLC 10 Seattle, WA 98101 100 West Harrison St, Suite N440 Telephone: (206) 622-4100 Seattle, WA 98119 11 Fax: (206) 464-0461 Email: jdowns@corrdowns.com Email: vjreno@renolawsea.com jcorr@corrdowns.com 12 Attorneys for Plaintiff/Counterclaim Def. Phone: (206) 962-5040 Attorneys for Defendant/Counterclaim Pltf. Highland Holdings, Inc. 13 REN Seafoods Inc. 14 RUSKIN MOSCOU FALTISCHEK, PC 15 s/ Jonathan Sullivan 16 Jonathan Sullivan, NY Bar No. 4050571 Brian Passarelle, NY Bar No. 11556 17 Admitted Pro Hac Vice Ruskin Moscou Faltischek, PC 18 1425 RXR Plaza East Tower, 15 Floor 19 Uniondale, New York 11556 20 Email: jsullivan@rmfpc.com boassarelle@rmfpc.com 21 Phone: (506) 663-6600 Pro Hac Vice Attorneys for 22 Defendant/Counterclaim Pltf. REN Seafoods Inc. 23 24 25

ORDER

The Court GRANTS the parties' stipulated motion to extend certain pretrial deadlines.

Dkt. No. 18. The case schedule is amended as follows:

| Event: | Amended Deadline: |
|--|--|
| Disclosure of expert testimony under FRCP 26(a)(2) | Rebuttal: 05-15-2024 Supplemental: 06-15-2024 |
| All motions related to discovery must be filed by | 07-01-2024 |
| Discovery must be completed by | 07-31-2024 |

All other unexpired deadlines set forth in the Court's prior scheduling order (Dkt. No. 10) remain unamended.

Dated this 11th day of April, 2024.

Kymberly K. Evanson

United States District Judge

Hymberly X Eanson